

# **FB EXHIBIT A**

## Facebook's Proposed Case Schedule

Date	Event
<b>I. Substantial Completion of Document Productions</b>	
January 31, 2022	Substantial completion of party document productions <sup>1</sup>
March 17, 2022	Amended privilege logs for substantially complete productions due (Dkt. 462)
<b>II. Fact Depositions/Close of Fact Discovery</b>	
February 14, 2022 to June 17, 2022	Fact depositions (party and non-party).
June 17, 2022	Close of fact discovery
<b>III. Class Certification</b>	
July 13, 2022	Motion for class certification Disclosure of Plaintiffs' expert witnesses in support of class certification and service of related expert declarations/reports regarding same
July 13, 2022 to August 10, 2022	Depositions of Plaintiffs' class certification expert(s)
August 24, 2022	Opposition to motion for class certification Disclosure of Facebook's expert witnesses in opposition to class certification and service of related expert declarations/reports regarding same
August 24, 2022 to September 7, 2022	Depositions of Facebook's class certification expert(s)
September 14, 2022	Reply in support of motion for class certification
<b>IV. Expert Discovery</b>	
October 10, 2022	Plaintiffs' Rule 26(a)(2) expert disclosures
November 21, 2022	Defendants' Rule 26(a)(2) expert disclosures

<sup>1</sup> The proposed substantial completion deadline assumes the parties will focus their efforts in the intervening period on document productions and that depositions will be held after substantial completion.

## Facebook's Proposed Case Schedule

December 19, 2022	Rebuttal expert reports
January 16, 2023	Close of expert discovery
<b>V. Dispositive Motions</b>	
30 days after issuance of class certification decision	Notice Period for Opt Outs
15 days after close of Opt Out Notice Period	Deadline for Dispositive motions
30 days after filing of dispositive motions	Oppositions to dispositive motions
14 days after filing of oppositions to dispositive motions	Replies in support of dispositive motions
<b>VI. Trial</b>	
August 2023 (estimated)	Trial